

1 Mark S. Askanas (SBN 122745)
2 Dylan B. Carp (SBN 196846)
3 JACKSON LEWIS LLP
4 199 Fremont Street, 10th Floor
5 San Francisco, California 94105
6 Telephone: (415) 394-9400
7 Facsimile: (415) 394-9401
8 askanasm@jacksonlewis.com

9 Attorneys for Plaintiff
10 CRUMP INSURANCE SERVICES, INC.

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA

14 CRUMP INSURANCE SERVICES, INC.,

15 Plaintiff,

16 v.

17 MICHAEL P. MCGRATH, an individual, ALL
18 RISKS, LTD., a corporation, and Does 1
19 through 50, inclusive,

20 Defendants.

Case No. C-07-4636 MMC

**STIPULATION TO MODIFY
BRIEFING SCHEDULE AND
CHANGE HEARING DATE ON
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT AND
[PROPOSED] ORDER**

Date: October 10, 2008
Time: 9:00 a.m.
Courtroom: 7
Judge: Maxine M. Chesney

Magistrate Judge Larson previously ordered Defendants All Risks, Ltd. and Michael McGrath to produce documents responsive to requests propounded by Plaintiff Crump Insurance Services, Inc. by September 8, 2008. Defendants produced close to 2000 pages at that time. However, the retrieval of archived tapes and the restoration of those tapes delayed Defendants' ability to review additional electronic documents that may have been responsive. As a result, Defendants produced an additional 1000 pages on September 15, 2008 and may have a final set of documents ready to be produced by September 17, 2008. Accordingly, it is appropriate to allow Plaintiff additional time to review those documents prior to completing and filing its Opposition to Defendants' Motion for Summary Judgment. That Opposition is currently due on September 19, 2008. The parties thus have good cause to request that this Court extend the time for Plaintiff to file its Opposition, which also causes a continuance in the hearing on Defendants' Motion for Summary Judgment.

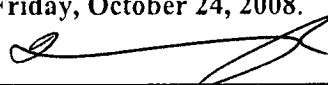
Defendants All Risks, Ltd. and Michael McGrath and Plaintiff Crump Insurance Services, Inc. hereby stipulate to modify the briefing schedule for Defendants' Motion for Summary Judgment and the hearing date as follows:

Plaintiff's Opposition due **Friday, October 3, 2008.**

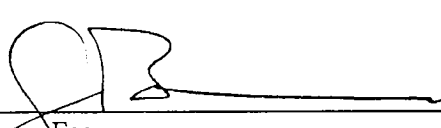
Defendants' Reply due **Friday, October 10, 2008.**

Hearing moved to 9:00 a.m. on **Friday, October 24, 2008.**

Dated: 9/15/08


 Mark S. Askanas, Esq.
 Dylan B. Carp, Esq.
 JACKSON LEWIS LLP
 Counsel for Plaintiff
 CRUMP INSURANCE SERVICES, INC.

Dated: 9-15-08


 John Baum, Esq.
 CURIALE DELLAVERSON
 HIRSCHFELD & KRAEMER, LLP
 Counsel for Defendants
 MICHAEL P. MCGRATH and ALL RISKS, LTD.

~~[PROPOSED]~~ ORDER


In consideration of the above, IT IS SO ORDERED that the briefing schedule is modified and hearing date is moved on Defendants' Motion for Summary Judgment as follows:

Plaintiff's Opposition due **Friday, October 3, 2008.**

Defendants' Reply due **Friday, October 10, 2008.**

Hearing moved to 9:00 a.m. on **Friday, October 24, 2008.**

Dated: September 16, 2008


MAXINE M. CHESNEY
Judge, United States District Court
Northern District of California